

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
THE EXPORT-IMPORT BANK OF
THE REPUBLIC OF CHINA,

Plaintiff/Judgment Creditor,

-against-

GRENADA,

Defendant/Judgment Debtor.

GMO TRUST, on behalf of its series GMO EMERGING
COUNTRY DEBT FUND, GMO EMERGING COUNTRY
DEBT L.P., GMO EMERGING COUNTRY DEBT
INVESTMENT FUND PLC, GREYLOCK GLOBAL
OPPORTUNITY MASTER FUND LTD., and FRANKLIN
TEMPLETON EMERGING MARKET DEBT
OPPORTUNITIES FUND PLC,

Intervenors/Defendants.
----- X

Civil Action No. 13-cv-1450 (HB)

| |
|------------------------------------|
| USDC SDNY |
| DOCUMENT |
| ELECTRONICALLY FILED |
| DOC #: _____ |
| DATE FILED: <u>10/15/14</u> |

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned
attorneys for Plaintiff The Export-Import Bank of the Republic of China ("Ex-Im Bank") and
Defendant Grenada ("Grenada") that:

1. Exim Bank's Motion to Compel Grenada's Response to Plaintiff's First Set of
Document Requests to Defendant (ECF No. 60-62) (the "Motion") is hereby withdrawn without
prejudice.

2. Accordingly, the following documents filed by Ex-Im Bank on June 4, 2014 are
withdrawn: (1) the Notice of Motion of the Export-Import Bank of the Republic of China to
Compel Grenada's Response to Plaintiff's First Set of Document Requests to Defendant (ECF
No. 60); (2) the Memorandum of Law of the Export-Import Bank of the Republic of China in

Support of its Motion to Compel Grenada's Response to Plaintiff's First Set of Document Requests to Defendant (ECF No. 61); and (3) the Declaration of Paul E. Summit in Support of Motion by the Export-Import Bank of the Republic of China to Compel Grenada's Response to Plaintiff's First Set of Document Requests to Defendant (ECF No. 62).

3. The following documents filed by Grenada in opposition to the Motion on June 17, 2014 are also withdrawn: (1) the Declaration of Boaz S. Morag in Support of Defendant Grenada's Opposition to The Export-Import Bank of The Republic of China's Motion to Compel Grenada's Response to Plaintiff's First Set of Document Requests to Defendant (ECF No. 65); (2) the Declaration of Timothy N.J. Antoine (ECF No. 66); and (3) the Memorandum of Law of Grenada in Opposition to The Export-Import Bank of the Republic of China's Motion to Compel Grenada's Response to Plaintiff's First Set of Document Requests to Defendant (ECF No. 67).

4. In light of the withdrawal of the Motion, Ex-Im Bank's reply in further support of the Motion, which by "so ordered" stipulation (ECF No. 63) is to be served on or before June 24, 2014, need not be filed.

SO ORDERED:


WILLIAM H. PAULEY III U.S.D.J.

10/15/14

Dated: New York, New York
June 20, 2014

SULLIVAN & WORCESTER LLP

By: /s/Paul E. Summit

Paul E. Summit
Andrew T. Solomon
1633 Broadway
New York, NY 10019
T. 212.660.3000
F. 212.660.3001
psummit@sandw.com
asolomon@sandw.com

Attorneys for Plaintiff /Judgment Creditor

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: /s/Boaz S. Morag

Boaz S. Morag
One Liberty Plaza
New York, New York 10006
T. 212.225.2894
F. 212.225.3999
bmorag@cgsh.com

Attorneys for Defendant/Judgment Debtor

SO ORDERED, THIS ___ DAY OF _____ 2014
